

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

JONNAE TAYLOR, individually and on
behalf of all others similarly situated,

Plaintiff,

v.

SUNRISE SENIOR LIVING
MANAGEMENT, INC., a Virginia
corporation,

Civil Action No. 17 CV 9020

Defendant,

KRONOS INCORPORATED, a
Massachusetts corporation,

Respondent in
Discovery.

DECLARATION OF MICHAEL SUMMERS

I, Michael Summers, declare as follows:

1. I am employed by Sunrise Senior Living Management, Inc., as the Chief Information Officer. In this role, I am responsible for, among other things, managing the information systems used to record employee data by Sunrise Senior Living Management, Inc. (“Sunrise”). In my position as the Chief Information Officer, I have access to the business records and data discussed in this Declaration. Unless otherwise stated, the following facts are within my personal knowledge and, if called and sworn as a witness, I could and would testify competently thereto.

2. Sunrise Senior Living Management, Inc.’s headquarters are located in McLean, Virginia. The McLean, Virginia headquarters are staffed by the corporate officers and executives of Sunrise Senior Living Management, Inc. responsible for overseeing Sunrise’s activities.

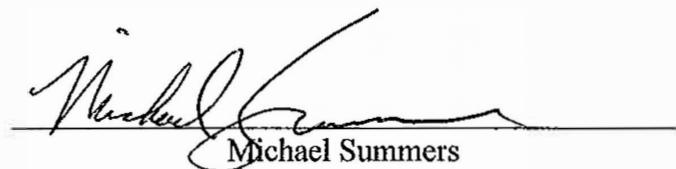
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3. Among other things, the activities conducted in McLean, Virginia include establishing systems, policies and procedures related to resident care and services; assisting the communities with employee recruitment and development; administering benefits and compensation; developing and supporting facility services and dining; sales and marketing strategy and support; handling of corporate communications, payroll, accounting and finance management, legal, asset management, community design, and real estate development.

4. Sunrise Senior Living Management, Inc., is incorporated in the Commonwealth of Virginia.

5. Upon review of Sunrise's Kronos timekeeping data, I have determined that, as of December 12, 2017, 1,182 active employees in Illinois are enrolled in the Kronos time clocks using the fingerprint-activated enrollment feature to track their hours worked.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct and that I executed this Declaration on December 14, 2017, at McLean, Virginia.



Michael Summers